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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
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MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Chapter 3.4 (Limited quantities)

Transmitted by the International Association of the Soap, Detergent and Maintenance Products Industry (AISE)

Introduction

A number of attempts have been made to revise and rationalise Limited Quantities provisions but a complete review has not yet been achieved.

There is a general move towards harmonisation linked to reformatting in international modal regulations and an growth in the developments of national regulations based on the UN Model Regulations. However, international and national regulations contain variations which are considered appropriate to them but which create problems for shippers who need to move and distribute goods under these different regulations.

The reason for this is partly due to the fact that UN Chapter 3.4 does not take account of the problems which arise in different circumstances and AISE offers this paper in an attempt to highlight these problems and seek solutions which may be universally acceptable.

AISE offers this paper partly as a proposal for certain changes and partly as a discussion document for development.

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Proposal 1

Reintroduce the table from Chapter 3 of the ninth edition which provides a matrix for the allocation of inner receptacle sizes into Column 7 of the Dangerous Goods List.

Justification

Over the course of time figures in Column 7 may be the subject of proposals for change and if no matrix is clearly provided in the Model Regulations control of the basic matrix will be lost.

Proposal 2

The inner receptacle sizes for Classes 3, 6.1. and 8 to be revised to be:

Liquid	PG II	3 litres
	PG III	5 litres
Solid	PG II	3 kilos
	PG III	5 kilos

Justification

The ratio between PG II and PG III in each class varies and the justification is difficult to understand.

		UN	RID/ADR
Class 3		1:5	3:5
Class 6.1	Liquid	1:10	1:6
	Solid	1:6	1:6
Class 8`	Liquid	1:2	1:3
	Solid	1:2	1:2

Rationalisation in these three classes at the suggested levels would have two benefits:

a) it would produce a more rational approach for the three most common classes where the ratio of risk between PG II and PG III is probably the same;

b) it would help industry to achieve some rationalisation of packaging as the packagings used are often the same specification for each of these three classes and for Class 9 where the PG III limit is 5 litres/5 kgs.

Proposal 3

3.4.8 should be replaced by a general small quantity exemption from labelling and documentation for, at least, Classes 3, 6.1, 8 and 9:

PG II	liquids	300mls
	solids	300 g.
PG III	liquids	500 mls
	solids	500 g.

Justification

The current 3.4.8 allows for an exemption based upon a marketing condition. Goods which are for personal care or household use are no less hazardous than the same product which is intended for industrial use. Furthermore, there is no definition of "personal care" and "household use" which leaves this provision open to interpretation.

Exemptions are already contained in Special Provision (e.g. SP 190 referring to UN1950 Aerosols).

An alternative might be to permit exemptions such as that for Aerosols via SPs which would allow the exemption to be entry linked rather than hazard linked but this might lead to a proliferation of SPs. A further alternative might be to provide an additional column in the Dangerous Goods List.

The quantities suggested are calculated as 5 % of the figures in Proposal 2.

Proposal 4

Para. 3.4.6 Revise to read:
Packages should be marked with the UN Number(s) and Proper Shipping Name(s) of the contents but need not display hazards warning labels.

Packages containing more than one named substance may be marked [UN 9999 followed by the Class Numbers and Divisions]. (e.g. UN 9999/6.1/3)

Justification

The IMDG Code permits the use of "Dangerous Goods in Limited Quantities" followed by the Class reference but this presents language problems for international transport.

RID and ADR have adopted the use of the UN Numbers or "LQ" set in a diamond outline to overcome the difficulty of language but this may present problems when a separately printed display is attached to the package. Also "LQ" may have other meanings in some parts of the world and a diamond outline may be similar to a trade logo.

The proposed method is more readily linked to the existing UN system.

Proposal 5

Add the following to the text in para. 3.4.7:

"For mixed packaging the description should accord with the package marking."

Justification

Unless the package markings are used in documents there is no means of identifying the relevant packages

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